



DEPARTMENT OF THE TREASURY
UNITED STATES MINT
WASHINGTON, D.C. 20220



SDMS DocID 2001325

ORIGINAL
(Red)

March 13, 2002

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

MAR 18 2002

Dear Ms. Prisk:

At the request of the United States Environmental Protection Agency, I am responding to a Required Submission of Information on the Lower Darby Creek Area Superfund Site - Clearview Landfill, Folcroft Landfill and Folcroft Landfill Annex located in Delaware and Philadelphia counties.

The attached report has been prepared by the United States Mint to provide any information about the alleged release of hazardous substances by the Philadelphia Mint to above-mentioned sites during the period of 1958-1976.

If you need to contact me with any questions, I can be reached at (202) 354-7400.

Sincerely,

Bradford E. Cooper
Associate Director
Manufacturing

CONFIDENTIAL
(Red)

This report has been prepared to respond the U.S. Environmental Protection Agency ("EPA") inquiry dated, November 5, 2001, regarding any information the Mint can provide about alleged release of hazardous substances by the Philadelphia Mint to above sites during the period of 1958-76.

As requested by EPA, the HQ and Philadelphia staff has done considerable research and have not been able to locate any documents or individuals who could provide any relevant information corresponding to that period. However, as requested by EPA, a list of personnel, who were present during 1958-76 and are currently employed with the Mint, has been prepared by the Philadelphia Mint and is shown in Attachment A. Also, as required by EPA, a formal response to Enclosure F has been prepared and is shown in Attachment B.

The EPA has supplied us copies of documents, which they have in their possession and link us with the above sites. We tried to locate and contact the individuals, who signed the paper work at that time but our efforts were not successful. The persons are either deceased or we have not been able to locate them.

We have also researched HQ documents, which were sent to the record's center or to the National Archives. We have found no information dealing with the above sites. Also, the Philadelphia Mint has researched their records sent to the Archives Regional Office, and found no records dealing with the above sites corresponding to that time period.

The Attachment C shows copies of the Mint and Treasury Directives currently being used for maintaining Mint records. This information is supplied to support Question 14 of Enclosure F.

ATTACHMENT A

EPA REQUEST 1958-1976

Dave Smallwood, the Mint Environmental Engineer, requested me to try to determine what the Mint would have had hauled or disposed of during the period 1958-1976.

The Procurement people with that knowledge; Gerry Arnst, Lou Amerossi and Barry Spadt are deceased.

Procurement documentation is no longer available. During 1958-1976 all purchase orders and contracts were typed and all related matter was hand written. Procurement documents are retained for a period of six years nine months. After that they are disposed of...purchase orders, contracts, log books, etc.

Having examined the trip tickets provided by HQ I was able to identify the following employees who might have some knowledge of the material hauled from the Mint.

George Holley, work leader for the custodial crew, no known address

L. Frederico deceased

J. D'Aquitanti, work leader on the dock, no known address

Norman Glestein, dock supervisor, retired to Florida, having checked with people who knew him we were unable to come up with an address.

John Williams deceased

William Devlin now works in Numismatics but has no recollection of what was shipped out. He can be contacted at

Mr. William Devlin

151 N Independence Mall E

Philadelphia PA 19106

Phone 215-408-0563 this is not a direct line to Mr. Devlin but they can find him for you.

Walt Grahowski day work foreman retired and no known address

Officer D. Dougherty, no known address

Frank Arganzio deceased

Others contacted

James Morgan, Inspector General for the Treasury during the period in question has no knowledge of what would have been hauled out. He can be contacted at the following address:

Mr. James Morgan

Supervisory Contract Auditor

Defense Audit Agency

Boeing Sub office

Mail Stop P3145

PO Box 16859

Philadelphia PA 19142-0859

Phone 610-591-6297

Steve Kunderewicz, current Administrative Officer, has no knowledge of what was hauled out. He was working in Assay at that time. He can be reached at the Philadelphia Mint.

Mr. Steve Kunderewicz
Administrative Officer
151 N Independence Mall E
Philadelphia PA 19106
Phone 215-408-0146

Joe Kukuska, current supervisor on the dock, recalls that all refuse generated by the Mint except for scrap metal was hauled out. This would have included oily rags, paper, cinder block, furnace brick, food scraps, lumber, wooden pallets, turnings from the die shop, broken glass etc. He can be reached at:

Mr. Joe Kukuska
Shipping and Receiving Supervisor
151 N Independence Mall E
Philadelphia PA 19106
Phone 215-408-0206

Frank Goffredo of Human Resources states that the Mint does not retain records on retirees. He can be reached at:

Mr. Frank Goffredo
151 N Independence Mall E
Philadelphia PA 19106
Phone 215-408-0242

I have spoken with the old heads in the building and checked with everyone that I can think of who might be able to shed some light on the subject. There are no records in the form of purchase orders, contract, or logs available. In 1958 we were located at the old mint on Spring Garden Street. We moved to our present location in 1960. Records are destroyed after six years nine months. Almost everyone from that era has retired or died. This is the best I can do. No one can recollect the name of any trash haulers other than Tri-county who might have serviced the mint during that time. I have no personal recollections since I didn't become a mint employee until 1985.

Howard Morgan
Contracting Officer

ATTACHMENT B

Response to Questions Listed in Enclosure F

1. The current nature of business of US Mint is to produce nation's circulating, numismatic, and commemorative coinage. The nature of the business was same during 1958-76 as well.
2. See Attachment A
3. No documentation for the period 1958-76 has been found to answer this question more precisely.
4. Same as Question No 3
5. Same as Question No 3
6. The US Mint could not locate any document relating to companies as listed in Question 6
7. No information is available
8. No information available.
9. We have found no document showing the spills/releases during 1958-76.
10. The person described in Question 2 were the only ones we could locate corresponding to that time period. The names and addresses are given in Attachment A.
11. No information is available.
12. No information is available
13. Brad Cooper, Associate Director – Manufacturing
US Mint
801 9th Street, NW
Washington, DC 20220
14. The documents are no longer available. The current document retention policy is shown in Attachment C.

ATTACHMENT C

ORIGINAL
(REC)

LIST OF MINT AND TREASURY DIRECTIVES

Chapter 7 - Administrative Programs
Part B - Documentation Systems

RECORDS MANAGEMENT PROGRAM

1. PURPOSE. This directive establishes records management standards, policy and responsibilities for the U.S. Mint's Records Management Program.
2. SCOPE. All Mint Employees
3. AUTHORITY.
 - a. Department of the Treasury Directive TD 25-02, Records Disposition Management Program and Removal of Papers, dated April 7, 1992.
 - b. 44 U.S.C. Chapters 21, 29, 31 and 33.
 - c. 18 U.S.C. Chapter 101
 - d. 36 CFR, Chapter 12, Subchapter B - Records Management
4. CANCELLATION. Mint Directive 7B-3, Records Documentation and Disposition Management Program, dated February 1987.
5. POLICY. It is the policy of the United States Mint that all employees become familiar with and comply with the provisions of applicable laws, regulations and directives pertaining to the proper management of Mint records.
6. OUTCOME. A records management program that properly documents Mint activities and meets the requirements of the National Archives and Records Administration as outlined in the United States Code and Code of Federal Regulations.
7. RESPONSIBILITIES. The Director's Office and each Associate Director, Assistant Director, Chief of a Director's Staff Office, Superintendent/Officer in Charge is responsible for establishing and maintaining an effective records management program within their area of responsibility. All Mint employees who receive, create, utilize or maintain any type of government record must ensure that proper records management procedures are observed.

8. CRITICAL REQUIREMENTS. Procedures contained in the Mint Records Management Handbook must be followed. Copies of the Handbook may be obtained from the Mint Records Management Officer, Office of Management Services. No Mint record may be destroyed, removed or otherwise disposed of unless such disposition has been authorized by a records schedule approved by the Archivist of the United States. Disposition of Mint records must be made as required by the approved records schedule. All Mint records must be listed on an office file plan.
9. SUNSET REVIEW DATE. September 2002.
10. RESPONSIBLE OFFICE. Office of Management Services.

Agency

REQUEST FOR RECORDS DISPOSITION AUTHORITY		JOB NUMBER <i>N1-104-99-3</i>	
To: NATIONAL ARCHIVES and RECORDS ADMINISTRATION (NIR) WASHINGTON, DC 20408		DATE RECEIVED <i>9/13/99</i>	
1. FROM (Agency or establishment) Department of the Treasury		NOTIFICATION TO AGENCY <i>SEP 13 1999</i> In accordance with the provisions of 44 U.S.C. 3303a, the disposition request, including amendments, is approved except for items that may be marked "disposition not approved" or "withdrawn" in column 10.	
2. MAJOR SUBDIVISION United States Mint			
3. MINOR SUBDIVISION Office of Management Services			
4. NAME OF PERSON WITH WHOM TO CONFER George F. Bamford	5. TELEPHONE 202-874-5972 <i>354-7737</i>	DATE <i>3-23-00</i>	ARCHIVIST OF THE UNITED STATES <i>John W. Paul</i>
6. AGENCY CERTIFICATION I hereby certify that I am authorized to act for this agency in matters pertaining to the disposition of its records and that the records proposed for disposal on the attached <u>1</u> page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified; and that written concurrence from the General Accounting Office, under the provisions of Title 8 of the GAO manual for Guidance of Federal Agencies, <input checked="" type="checkbox"/> is not required; <input type="checkbox"/> is attached; or <input type="checkbox"/> has been requested.			
DATE <i>9/2/99</i>	SIGNATURE OF AGENCY REPRESENTATIVE <i>George F. Bamford</i>		TITLE Records Management Officer
7. ITEM NO.	8. DESCRIPTION OF ITEM AND PROPOSED DISPOSITION	9. GRS OR SUPERSEDED JOB CITATION	10. ACTION TAKEN (NARA USE ONLY)
	SAFETY AND HEALTH RECORDS - UNITED STATES MINT ASBESTOS ABATEMENT, MONITORING AND TESTING RECORDS - SEE ATTACHED PAGE.		

ITEM NO.	DESCRIPTION OF ITEM AND PROPOSED DISPOSITION	GRS OR SUPERSEDED JOB CITATION	ACTION TAKEN (NARA USE ONLY)
SAFETY AND HEALTH RECORDS			
1.	<p>UNITED STATES MINT ASBESTOS ABATEMENT, MONITORING AND TESTING RECORDS. Consists of asbestos abatement documents maintained by the Mint to include such items as contracts, contract solicitations, contract monitoring reports, inspections, testing reports/results, statements of work, and various other papers and correspondence documenting the Mint's asbestos hazard abatement program.</p> <p>a. Asbestos Abatement Contracting and Related Documents Maintained at Mint Headquarters.</p> <p>DISPOSITION: Temporary. Cut-Off when contract is closed. Transfer to the records center 2 years after cut-off records and any related documents that are not required for immediate access in conducting current Mint business. Destroy when newest documentation in shipment is 70 years old. DESTROY 70 YEARS AFTER TRANSFER TO RECORD CENTER.</p> <p>b. Documents Maintained by Building Management offices indicating existence of asbestos containing materials in the facility and abatement actions completed. Includes such items as copies of asbestos containment maintenance and periodic inspection plans and schedules, copies of surveys to identify asbestos containing materials in building, inspection reports, monitoring reports, selected contract documents and other pertinent documents necessary to reflect the asbestos history/abatement/hazard profile of the facility.</p> <p>DISPOSITION: Temporary. Transfer to the records center upon deactivation of the facility. Destroy when newest documentation in shipment is 70 years old. DESTROY 70 YEARS AFTER TRANSFER TO RECORD CENTER.</p> <p>A copy of items reflecting current asbestos abatement/hazard conditions will be transferred to new building owner after review by Mint Counsel personnel.</p>		
	<p>c. ELECTRONIC VERSIONS. Records created by E-Mail, Word Processing and Spreadsheet Applications may be deleted after file copy is generated, and when no longer needed for reference and updating.</p> <p>Note: Retention of Contract Files pertaining to Asbestos abatement/monitoring will exceed time limits established for contract files by GRS 3-3. This time extension request is due to potential for litigation.</p>		

*Part + Dist charges make per conversation with agency RO and NAWMA.
M. Donovan
2/7/00*



National Archives and Records Administration

8601 Adelphi Road
College Park, Maryland 20740-6001

Date : November 4, 1999

Reply to

Attn of : Marva W. Frazier

Subject : Appraisal of Job No. N1-104-99-3

To : NWMD, NWMW& NWCT

The Department of the Treasury's United States Mint submits Job No. N1-104-99-3 to request disposition authority for asbestos abatement monitoring and testing records.

The Job consists of 1 item with 3 sub-items: **Item 1a, Asbestos Abatement Contracting and Related Documents Maintained at Mint Headquarters (temporary)**. This item covers contracts, (solicitations, monitoring reports), reports/results, statements of work and various other files and correspondence documenting the Mint's asbestos hazard abatement program.

Item 1b, Documents Maintained by Building Management offices indicating existence of asbestos containing materials in the facility and abatement actions completed (temporary). These files consist of the following records: copies of asbestos containment maintenance and periodic inspection plans; schedules and surveys that identify asbestos containing materials in buildings; reports (inspections and monitoring), selected contract documents and files deemed necessary to the U.S. Mint's asbestos history, abatement, hazard profiles of their facilities.

Both items 1a and 1b covers unique contract and procurement records that relate to the health of U.S. Mint employees, therefore, the disposition authority (GRS 3/3) established to cover these records will not apply. The records are arranged by Mint office locations. The U.S. Mint is requesting these records be retained for 70 years for legal purposes.

Item 1c, Electronic Versions of Records (temporary), this item consist of electronic versions of the records created by e-mail, Word Processing, and Spreadsheet applications (charts & graphs), which are proposed as temporary and can be deleted after file copy is generated.

According to George Bamford, Records Officer at the Mint, the records date from 1987-1995 and consist of 18 cubic feet. The office is planning to move to another location, and an unscheduled record exception request was granted to transfer the records to the Washington National Records Center prior to the approval of this Job.

I recommend approval of this schedule.



MARVA W. FRAZIER
Life Cycle Management Division

7/10/02
RAG